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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) Criminal No. CR 07-0074 WHA

Plaintiff,

v.

MICHAEL EDISON,

Defendant.

STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME

22 The above-captioned matter came before the Court on March 12, 2007, for initial
23 appearance. The defendant was represented by John G. Hanlin, Esq., and the government was
24 represented by Jeffrey Finigan, Assistant United States Attorney. The matter was continued to
25 March 20, 2007, at 9:30 a.m. for plea and identification of counsel and at 2:00 p.m. for initial
26 appearance before the Honorable William H. Alsup, United States District Court Judge.

27 The Court made a finding that the time from and including March 12, 2007, through and
28 including March 20, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C.

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1 § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best
2 interest of the public and the defendant in a speedy trial. The finding was based on the need for
3 the defendant to have reasonable time necessary for effective preparation, taking into account the
4 exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C.
5 § 3161(h)(8)(B)(iv).

6 The parties hereby agree to and request that the case be continued until March 20, 2007,
7 and that the exclusion of time until then be granted. The parties agree and stipulate that the
8 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
9 because the ends of justice served by this continuance outweigh the best interest of the public and
10 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
11 prepare, taking into account the exercise of due diligence, and will provide for continuity of
12 counsel for the defendant.

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14 DATED: March 12, 2007

/s/

JOHN G. HANLIN
Counsel for Michael Edison

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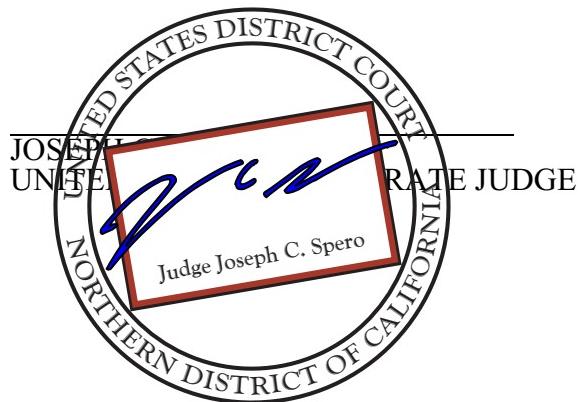
17 DATED: March 12, 2007

/s/

JEFFREY R. FINIGAN
Assistant U.S. Attorney

20 So ordered.

21 DATED: March 14, 2007



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